

KASURI BYCK, L.L.C.
340 U.S. Highway 1 North
Edison, New Jersey 08817
Attorneys for Gurdip Singh

IN RE GURDIP SINGH,

Debtor.

KARANJIT SINGH

Plaintiff

v.

GURDIP SINGH,

Defendant.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Adversarial Complaint

Bankruptcy No.: 14-19878-CMG
Adversary No.: 16-1373

ANSWER AND DEFENSES

Defendant GURDIP SINGH whose address is 114 Blair Road, Apt. 1, Port Reading, New Jersey 07064 (hereinafter referred to as "Defendant"), by way of Answer to Plaintiff's Adversarial Complaint says:

PARTIES AND JURISDICTION

1. Defendant admits that he was a resident of New Jersey at the time of the incidents set forth in the Complaint. Defendant is without sufficient knowledge or information to admit or deny the remaining assertions of paragraph 1 of the First Count of the Plaintiff's Adversarial Complaint. Plaintiff is left to its proofs. To the extent a response is required to this allegation, Defendant denies same.

2. Defendant admits the allegations contained in Paragraph 2.

3. Paragraph 3 contains legal conclusions to which no response is required. To the extent that a response is required, Defendant denies that the causes of action in the Complaint are "core" matters.

4. Defendant admits the allegations contained in Paragraph 4.

CAUSES OF ACTION

1. Defendant admits the allegations contained in Paragraph 1.
2. Defendant denies the legal assertions of paragraph 2 as to Defendant acting “willfully, maliciously, and intentionally.” Defendant is without sufficient knowledge or information to admit or deny the remaining assertions of paragraph 1 of the First Count of the Plaintiff’s Adversarial Complaint. Plaintiff is left to its proofs. To the extent a response is required to this allegation, Defendant denies same.
3. Defendant admits the allegations contained in Paragraph 3.
4. Defendant admits the allegations contained in Paragraph 4.
5. Defendant admits the allegations contained in Paragraph 5.
6. Paragraph 6 contains legal conclusions to which no response is required. To the extent that a response is required, Defendant denies that the judgment is not dischargeable.

WHEREFORE, Defendants demand judgment dismissing Plaintiff’s Adversarial Complaint and respectively asks the Court to order damages, costs, interest, and fees to Defendant.

SEPARATE DEFENSES

FIRST SEPARATE DEFENSE

The Adversarial Complaint fails to set forth a cause of action upon which relief may be granted as to Plaintiff.

SECOND SEPARATE DEFENSE

Plaintiff has no standing to bring this action.

THIRD SEPARATE DEFENSE

Plaintiff is barred by the doctrine of waiver.

FOURTH SEPARATE DEFENSE

Plaintiff is barred by the doctrine of estoppel.

FIFTH SEPARATE DEFENSE

Plaintiff is barred by the doctrine of laches.

KASURI BYCK, LLC
Attorneys for Defendant

Dated: June 27, 2016

/s/Harrison Ross Byck, Esq.
Harrison Ross Byck, Esq.,
For the Firm